

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

Hon. Renee M. Bumb

This Document Relates To:
All Actions

Civ. No. 19-2875 (RMB/SAK)

PLAINTIFFS' NOTICE OF VIDEOTAPED DEPOSITION SAROJA GORANTLA, MS

**TO: Alexia Brancato
Lindsey Foster
Kirkland & Ellis, LLP
601 Lexington Avenue,
New York, NY 10022**

*Counsel for Defendants Torrent Pharmaceuticals LTD
and Torrent Pharma Inc.*

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped of Saroja Gorantla, , Senior Manager in Regulatory Affairs, The deposition will commence on **Thursday September 19, 2024, at 9:30 A.M. Eastern Standard Time**, and continue until completion, via remote deposition, in accordance with the Fact Witness Deposition Protocol and Case Management Order No. 20, filed on November 17, 2020 (Document 632).

The witness shall produce the documents requested at Exhibit A, attached hereto, at least 3 days in advance of this noticed deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

Paul S. Rothstein
Law Offices of Paul S. Rothstein, P.A.
626 NE 1st Street
Gainesville, Florida 32601
psr@rothsteinforjustice.com

The deposition will be taken before an officer authorized to administer oaths. Testimony given during the deposition will be recorded by sound video recording and stenographic means.

DATED this 16th day of September 2024.

FOR PLAINTIFFS

/s/ Stacy A. Burrows
Stacy A. Burrows
Barton and Burrows, LLC
5201 Johnson Dr. Ste. 110
Mission, Kansas 66205
(913) 563-6253
Stacy@bartonburrows.com

/s/ Paul S. Rothstein
Paul S. Rothstein
Law Offices of Paul S. Rothstein P.A.
626 N.E. 1st Street
Gainesville, Fl. 32601
(352)-376-7650
psr@rothsteinforjustice.com
Attorney for Plaintiffs

EXHIBIT A

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Saroja Gorantla.
2. The complete production of Saroja Gorantla's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

CERTIFICATE OF SERVICE

I, Stacy Burrows, hereby certify that on September 16, 2024, I caused true and correct copies of the foregoing to be transmitted via ECF to all counsel having registered an appearance on ECF, with courtesy copies served on counsel for Torrent Pharmaceuticals Limited and Torrent Pharma Inc., and Defendants' counsel, as listed above, via email.

DATED this 16th day of September 2024.

/s/ Stacy A. Burrows

Stacy A. Burrows

Barton and Burrows, LLC

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Mission, Kansas 66205

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